

REMARKS

Claims 1-2, 4-17 and 19-24 are pending in this application. Claims 1, 7 and 9 have been amended herein. Applicant respectfully requests reconsideration of the claims in view of the following remarks.

A number of the claims have been objected to in view of informalities. Each of these informalities has been corrected herein.

Claim 1 has been amended to recite "the at least one opening is configured so that a die placed on the support structure can be drawn against the elastomer bumps by a force generated by a vacuum and applied through the opening." This amendment was made in view of the recent Federal Circuit ruling in *IPXL Holdings LLC v. Amazon.com Inc.*, Fed. Cir., No. 05-1009, 11/21/05, which held that a claim is indefinite under 35 U.S.C. § 112 if it attempts to claim both a system and a method for using that system. Claim 1 has been amended so that the reference to the placement of the die is provided in the context of the structure of the opening, rather than a method of using the carrier. From the standpoint of searching, the scope of this language is the same and therefore entry of the amendment is respectfully requested.

Claims 1-2, 5-17, and 20 are rejected under 35 U.S.C. 103(a) as being unpatentable over Farnworth (U.S. Patent No. 5,982,185) in view of Farnworth et al. (U.S. Patent No. 6,222,280). The other pending claims were rejected over these Farnworth patents in combination with other prior art.

Claims 1 and 9 have each been amended to include language that was taken directly from claims 23 and 24. Since the language was in the previously pending claims, no new issues are raised and entry of the amendment is appropriate.

After carefully studying the prior art references, Applicant respectfully submits that the presently pending claims are allowable. Referring first to Farnworth's '185 patent, the carrier 10 consists of a base 14, an interconnect 16 and a force applying mechanism 18 (see col. 3, lines 1-25), which presses the die against the base. The force applying means includes a spring and a clamp mechanism. The clamp member 24, the spring 22, the pressure plat 20 and the force applying mechanism 18 all include a central opening (see col. 1, lines 27-35). Such a feature cannot be found in the present application.

Furthermore, the central openings are designated to hold and manipulate the die 12 with a vacuum tool (not shown). Such a vacuum tool is well known as a vacuum tip with a central vacuum bore to hold the die on the tip of the tool. The openings permit access to the die. This is not similar to the present application. A vacuum can be directed through openings 48B and 48I to hold the die 12 in place. But it is not described how this could be performed.

In addition, Farnworth uses microbump contacts, which are not described as elastomer elements. The complete construction of Farnworth is very complex and expensive in costs. On the other hand, the present application has a base support provided with elastomer bumps equal with elastomer bumps used as contact elements on dies. One significant advantage is that the process for assembling such elastomer bumps on the base support is very simple (pick and place).

Farnworth does not provide any hint of how to use such elastomer bumps as contact element for all contacts of a die. Referring to Figure 4 of the present application, such an elastomer bump cannot be found in Farnworth et al. (U.S. Patent No. 6,222,280 B1). Farnworth et al. discloses a conductive polymer donut 42, or according to Figure 4, a conductive polymer

projection formed on a contact pad (col. 7, lines 55-58). Farnworth et al. does not describe elastomer bumps as can be seen from Figure 4 of the present application.

Further, Hidekatsu discloses parallel manufacturing of resin bumps 13 with a curled form conductive layer, but resin is not similar to an elastomer material.

Applicant has made a diligent effort to place the claims in condition for allowance. However, should there remain unresolved issues that require adverse action, it is respectfully requested that the Examiner telephone Ira S. Matsil, Applicant's attorney, at 972-732-1001 so that such issues may be resolved as expeditiously as possible. No fee is believed due in connection with this filing. However, should one be deemed due, the Commissioner is hereby authorized to charge Deposit Account No. 50-1065.

Respectfully submitted,



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Date

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